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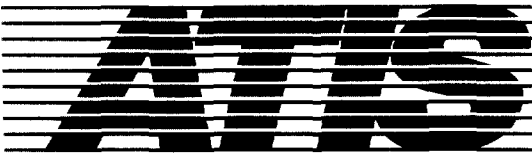
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February 24, 1997
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Alliance for Telecommunications
Industry Solutions

*Problem Solvers to the
Telecommunications Industry*

1200 G Street, N.W.
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Secretary
Federal Communications Commission
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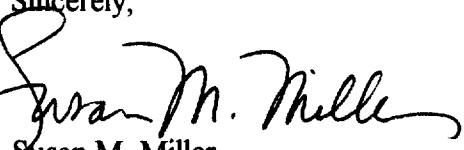
**Re: Implementation of Section 273 of the Communications
Act of 1934, as amended by the Telecommunications
Act of 1996 - CC Docket No. 96-254**

Dear Mr. Caton:

Enclosed herewith please find an original and eleven (11) copies of
the comments of the Alliance for Telecommunications Industry
Solutions, Inc., in the above-referenced proceeding.

If you have any questions, please call me at (202) 434-8828.

Sincerely,


Susan M. Miller
Vice President and General Counsel

COMMITTEES



cc: International Transcription Services
Secretary, Network Services Division, Common Carrier Bureau

Noted by G. J. As read
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**Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.**

In the Matter of

**Implementation of Section 273
of the Communications Act of 1934
as amended by the Telecommunications
Act of 1996.**

)
)
)
)

CC Docket No. 96-254

**Susan M. Miller
Vice President and General Counsel**

**Alliance for Telecommunications Industry Solutions, Inc.
1200 G Street, N.W.
Suite 500
Washington, D.C. 20005
(202) 434-8828**

February 24, 1997

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Implementation of Section 273)
of the Communications Act of 1934)
as amended by the Telecommunications) **CC Docket No. 96-254**
Act of 1996.)

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SUMMARY

The Alliance For Telecommunications Industry Solutions (“ATIS”) respectfully submits information regarding its thirteen (13) sponsored committees as ATIS has extensive experience with sponsoring both an accredited standards developing committee -- Committee T1, as well as non-accredited consensus resolution committees and forums -- the Carrier Liaison Committee and its subtending Network Interconnection/Interoperability Forum, Ordering and Billing Forum, Industry Numbering Committee, and Toll Fraud Prevention Committee; the Telecommunications Industry Forum; the Network Reliability Steering Committee; and the SONET Interoperability Forum, among others. ATIS notes, however, that it nor any of its subtending committees and forums appear to establish, at this time, “industry-wide standards for telecommunications equipment or customer premises equipment, or industry-wide generic network requirements for such equipment” as contemplated by the Act.

ATIS submits that while it takes no position on how to define “standard,” Committee T1 as an ANSI-accredited Committee, is sensitive to the antitrust compliance issues which may be presented by the standards development processes. As such, Committee T1 has established procedural safeguards and rigorous procedures to ensure that its standards processes operate fairly and that its members are not exposed to antitrust risks. These procedures are detailed herein.

ATIS further submits that while the Commission distinguishes between those standards developed by accredited entities and those that are not accredited, at least in the context of its committees, non-accredited processes need not mean that the processes used are less effective in ensuring that the activities of these groups are “open and accessible to the public.” Nor does it

mean that the output (e.g. “de facto standards”) are somehow tainted or established in an environment with “competitive problems.” The non-accredited ATIS-sponsored committees, such as the CLC discussed more fully herein, are required to incorporate certain fundamental principles of due process in their operating procedures as safeguards to ensure that the activities of the group will not result in antitrust difficulties for itself or its participants.

With respect to Section 273(d)(2) as it pertains to the prohibition on use of proprietary information, the ATIS-sponsored Committee T1 has adopted the ANSI patent policy which does not preclude the adoption of a proposed American National Standard which includes the use of a patented technology so long as the patent holder will license the technology without compensation or under reasonable terms and conditions. The ANSI policy seeks to encourage early disclosure of patents so as to promote greater efficiency in standards development.

Finally, ATIS submits that while the discussion of industry-wide generic network requirements occurs quite randomly and infrequently in the ATIS-sponsored committees/forums, ATIS encourages the future discussion of these requirements and changes to them in ATIS committees. With regard to the role that ATIS might play in ensuring parties have access to these industry-wide generic requirements and standards development processes, ATIS believes that it could be of assistance should it be asked to do so. One such vehicle by which ATIS could facilitate such access would be through its active and extensive homepage on the world wide web.

**Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.**

In the Matter of

Implementation of Section 273)	
of the Communications Act of 1934)	
as amended by the Telecommunications)	CC Docket No. 96-254
Act of 1996.)	

**COMMENTS OF THE
ALLIANCE FOR TELECOMMUNICATIONS INDUSTRY SOLUTIONS INC.**

The Alliance for Telecommunications Industry Solutions ("ATIS") submits these comments with the Federal Communications Commission (the "FCC" or the "Commission") in response to the FCC's Notice of Proposed Rulemaking ("NPRM"), In the Matter of Implementation of Section 273 of the Communications Act of 1934, as amended by the Telecommunications Act of 1996, CC Docket No. 96-254, adopted December 10, 1996 and released December 11, 1996.

ATIS's comments provide background information regarding its role in telecommunications network interconnection standards development; national issues associated with exchange access, interconnection and interoperability which involve network architecture, network management, testing and operations; the planning, administration, allocation, assignment and use of the North American Numbering Plan ("NANP") resources and related dialing

considerations; national issues which affect ordering, billing, provisioning and exchange of information about access services; national issues with respect to toll fraud prevention; issues related to the implementation of standards associated with the provision, procurement, and use of new technologies, products, and services such as electronic data interchange, bar coding, and electronic bonding; analysis of network outages and endurance of a high level of network reliability; and SONET implementation issues.

ATIS submits that this information may be relevant to the Commission's consideration of Section 273(d) and those matters pertaining to manufacturing safeguards on which the FCC seeks comment, and in particular, Section 273(d)(4) which addresses non-accredited standards-setting entities that establish industry-wide standards for telecommunications equipment and customer premises equipment . In this context, it should be noted that neither ATIS nor any of its subtending committees and forums appear to establish, at this time, "industry-wide standards for telecommunications equipment or customer premises equipment, or industry-wide generic network requirements for such equipment" as contemplated by the Telecommunications Act of 1996 (the "Act"). ATIS does, however, have extensive experience with an accredited standards developing committee as well as other consensus resolution committees and forums and their open processes. It is in this context which ATIS submits these comments for the FCC's consideration.

I. INTRODUCTION AND STATEMENT

ATIS is a nonprofit association, open in membership to any North American providers or World Zone 1 Caribbean providers of telecommunications services with a plant investment in

transport and/or switching equipment or any provider engaged in the resale of those services. It is also open to any manufacturer of telecommunications network equipment used for the provision of telecommunications services in North American and/or World Zone 1 Caribbean countries; or any provider of enhanced services. ATIS is governed by a thirty-five member Board of Directors charged with the oversight of the activities of the organization. Members include representatives from local exchange carriers (“LECs”), interexchange carriers (“IXCs”), cellular and paging companies, manufacturers, and competitive local carriers.

ATIS has as its primary purpose to promote the timely resolution of national and international issues involving telecommunications standards and the development of operational guidelines. ATIS pursues this purpose through the sponsorship and support of thirteen (13) open industry committees and forums and a host of subtending committees and forums that address such issues as network interconnection, open network architecture, network outage analysis, installation, testing, and maintenance, ordering and billing, toll fraud prevention, and electronic data interchange. They include the American National Standards Institute (“ANSI”)-accredited standards Committee T1-Telecommunications (“Committee T1”), which develops American National Standards for network interfaces, as well as the Carrier Liaison Committee (“CLC”) which seeks to resolve, through consensus procedures, access and network interconnection issues arising on an industry-wide basis. The CLC has four subtending forums: 1) the Network Interconnection/Interoperability Forum (“NIIF”) on installation and maintenance, network management, network interconnection/architecture, interoperability testing of interconnected networks and equipment, and rating and routing information; 2) the Ordering and Billing Forum (“OBF”), on the ordering and provisioning of services, telecommunications service order

requests, billing, message processing associated with billing and collections, and toll free service issues; 3) the Industry Numbering Committee (“INC”) on the planning, administration, allocation, and assignment and use of NANP resources; and 4) the Toll Fraud Prevention Committee (“TFPC”) on telecommunications fraud.

ATIS also sponsors the Telecommunications Industry Forum (“TCIF”), which gives practical application to standards on electronic data interchange, bar coding and standard coding language, as well as the development and implementation of guidelines on electronic bonding for the telecommunications industry. The Network Reliability Steering Committee (“NRSC”) is also under ATIS sponsorship, analyzing the industry’s reporting of network outages, including the identification of trends which may impact the network’s high level of reliability, and measurement of the effectiveness of the FCC’s Network Reliability Council over time. Finally, ATIS also sponsors the SONET Interoperability Forum, formed to identify and solve SONET implementation issues.¹

The following sections provide an overview of the ATIS-sponsored committees and their operating principles as they address and provide examples of the kinds of “standards” activities on which the Commission is seeking comment.

II. OVERVIEW OF ATIS-SPONSORED COMMITTEES’ PROCESSES

A. ACCREDITED COMMITTEE T1

The Commission’s NPRM seeks comment on “how ‘standards’ should be defined for purposes of implementation of the 1996 Act to ensure that standards processes are open and

¹ Attachment A provides an overview diagram of the ATIS-sponsored committees and their subtending structure.

accessible to the public.”² While ATIS takes no position at this time as to how “standards” should be defined, it submits, by way of example, the experience of Committee T1, accredited by the American National Standards Institute (“ANSI”). Committee T1 was established under ATIS’s sponsorship (formerly the “Exchange Carriers Standards Association”), to provide an open industry forum for the development of technical standards for the interconnection and interoperability of telecommunications systems at various points of network interface. The work of Committee T1 focuses specifically on the development of “external” interface standards at the point of exchange carrier interconnection with interexchange carriers, information and enhanced service providers, end users, and customer premises equipment. In addressing external interface standards, the Committee T1 examines physical, electrical, mechanical, and functional characteristics, and establishes, where appropriate, the minimum standard necessary to provide proper interconnection and interoperability of services and equipment. Standards for network switching, signaling, transmission, performance, operation, administration, and maintenance are addressed according to this criterion.³

² NPRM, at para. 31.

³ The Committee T1 has six technical subcommittees that are advised and managed by the T1 Advisory Group (“T1AG”). Each of the six technical subcommittees recommends standards and develops technical reports in its area of expertise which are then approved by both the T1AG and the Committee T1. These subcommittees also recommend positions on matters under consideration by other North American and international standards bodies. The technical subcommittees and their areas of expertise are: T1A1(Performance and Signal Processing, Network Survivability, and Multimedia Communications; T1E1(Power Systems/Interfaces, Analog Access, Wideband Access, and Electrical Protection); T1M1(Internetwork Planning/Engineering, Testing and Operations Systems and Protocols; T1P1(Personal Communications, Wireless Access and Terminal Mobility, Program Management and Standards); T1S1(Architectures and Services, Switching and Signaling Protocols, Broadband ISDN); and T1X1(Synchronization Interfaces, Metallic and Optical Hierarchial Interfaces).

ATIS sponsorship of the Committee T1 recognizes that there are industry efficiencies and consumer benefits to be gained by standardization, and that the formulation of basic technical standards, particularly in sophisticated industries such as telecommunications, is increasingly important. T1 seeks technical contributions from affected industry participants to develop appropriate standards. As in the case of any industry effort, ATIS acknowledges that the standards development process may present certain antitrust compliance issues. In particular, ATIS has been cognizant that the standards process must not (1) unfairly advantage one competitor over another; (2) restrict participation and consideration of a wide spectrum of views; (3) exclude competitors from the markets to which the standards apply; (4) exclude new competitors from the marketplace; or (5) inhibit innovation.

ATIS's sponsorship of the Committee T1 has been sensitive to these concerns. Consistent with the requirements of ANSI's Procedures for the Development and Coordination of American National Standards, T1 has established procedural safeguards to ensure that its standards processes operate fairly, that the standards it develops are reasonable, and that its members are not exposed to antitrust risks. Most importantly, membership and full participation in the Committee T1 are open to all parties with a direct and material interest in the T1 process and activities. There are four membership interest categories: (1) Exchange carriers, (2) Interexchange carriers, (3) Equipment manufacturers, and (4) Users and General Interest which includes user groups, professional associations, and federal and state governmental agencies. As the T1 Secretariat, ATIS ensures a balanced membership and participation without dominance by any single interest. In keeping with these principles, the T1AG is comprised of equal representation from each of the four interest categories.

T1 due process procedures provide additional guarantees of fairness and reasoned decision-making in standards development. All meetings of the Committee T1, including its subcommittees, working groups, and subworking groups are open and pre-announced to members and others having a direct and material interest in the subject matter of the proceeding. Today, this is accomplished electronically by the T1 bulletin board system ("T1BBS") as well as in hard copy for those parties requesting such documentation.⁴ Written agenda are also distributed electronically and in hard copy, in advance of the meetings. This openness in the T1 process permits the introduction of standards proposals by both T1 members and non-T1 members alike. Standards proposals are then publicized for comment, and subcommittee, working group, or subworking group participation are invited from any interested party. To become a T1 proposed standard, a two-thirds majority consensus of all T1 voting members must approve the proposal. A system of records documentation applies to all draft standards, voting ballots, objections, and appeals, as well as to the rationale for approving a standard.

Once a proposed standard is approved by the Committee T1, the standard is submitted to the American National Standards Institute ("ANSI") for a sixty-day review on public notice. This review includes verification that: (1) the requirements for due process, consensus, and other criteria for approval have been met; and (2) consideration of any submitted evidence that a proposed standard is contrary to the public interest, contains unfair provisions, is unsuitable for national use, or is technically inadequate. At each level of review, there is full opportunity to dissent to any standards proposal, and any dissenting comments must be properly addressed to reconcile differences wherever possible. Industry implementation of T1-developed standards is

⁴ The T1BBS can be located on the world wide web at www.t1.org.

entirely voluntary.

The Committee T1's organization, participation, procedures, and safeguards are designed so that interconnection and related technical standards may be developed with the requisite openness, fairness, efficiency, and responsiveness to the public interest. The Committee T1 has been recognized and endorsed by the FCC as an "appropriate organization for developing voluntary technical interconnection standards."⁵ As the Commission itself has observed:

[t]he proposed Committee T1 mechanism, with its open and voluntary membership requirements, appears to satisfy our concerns regarding the full participation in joint planning to public scrutiny Furthermore, we have concluded that the interconnection coordination activities and the organizational structure for limited technical planning . . . are consistent with the antitrust laws It has been our intent in fashioning the structure necessary to achieve limited joint planning to assign to the association, functions which are important for the provision of efficient planning but which will not create a basis for anticompetitive conduct.⁶

The FCC also noted that the T1 process makes it difficult for any party to manipulate technical standards to its own competitive advantage:

In the setting of network standards [the BOCs] must coordinate with one another, other exchange carriers, and the interexchange carriers through standards groups such as the Committee T1. While the standards adopted by these groups are voluntary, frequent and significant departures from them that affected CPE interconnection would be readily apparent to industry participants and to us and would be subject to investigation and appropriate remedies if those departures represented an attempt to harm competition

⁵ MTS and WATS Market Structure, Phase III: Establishment of Physical Connections Through Routes among Carriers; Establishment of Physical Connections By Carriers with Non-Carrier Communications Facilities: Planning Among Carriers for Provision of Interconnection Services, and in Connection with National Defense and Emerging Communications Services: and Regulations For and In Connection with the Foregoing, Report and Order, CC Docket No. 78-72, Phase III, 100 FCC 2d 860, 884 (1985).

⁶ Id. at 883-85.

in CPE markets.”⁷

B. NON-ACCREDITED ATIS COMMITTEES

While the Commission distinguishes between those standards developed by accredited standards development organizations like Committee T1, and those which are not developed by accredited standards organizations yet which may be producing “de facto standards”,⁸ ATIS submits that, at least in the context of its sponsored committees, non-accredited processes need not mean that the processes used are less effective in ensuring that the Committees are “open and accessible to the public.”⁹ Nor should the use of non-accredited processes suggest that the output, whether it be a “standard” or some operational/ technical guideline which has in essence become a “defacto standard”, is somehow tainted by the “non-accredited” process or may have been established in an environment with “competitive problems.”¹⁰ ATIS believes that a prudent approach to non-accredited processes in this competitive environment calls for certain precautions which are consistent with the due process embodied in the accredited processes.

In this connection, ATIS believes that there are certain principles which are fundamental to the operation of open industry forums such as those sponsored by ATIS. It requires that its “non-

⁷ Furnishing of Customer Premises Equipment by the Bell Operating Telephone Companies and the Independent Telephone Companies, CC Docket No. 86-79; Petitions of BellSouth, Ameritech, Bell Atlantic, and Southwestern Bell, for Expedited Relief From and Limited Waiver of Computer II Structural Separation Requirements, RM-5230, Notice of Proposed Rulemaking, FCC 86-113, (Adopted: March 13, 1986, Released: March 28, 1986, at para. 34.

⁸ NPRM, at para.34.

⁹ Id., at para.34.

¹⁰ Id.

accredited” committees/forums adopt these principles and then use them as the building blocks for their operating procedures. They must be incorporated into the committees’/forums’ procedures. ATIS submits that these principles serve as safeguards, ensuring that due process is afforded to all participants, and to the greatest extent possible, ensuring that the activities of the forum will not result in antitrust difficulties for itself or its participants. These principles are as follows: (1) All meetings shall be open; (2) Discussions are limited to issues that are industry-wide in scope, and that do not involve cost, price, market allocations or other antitrust-sensitive matters; (3) Written agendas shall be prepared and publicly disseminated in advance of all meetings; (4) The meeting notice shall be timely and provide adequate information about the matters to be discussed; (5) Adequate and accurate record keeping shall be maintained through the taking of minutes at all meetings, with the minutes being subsequently published and made available to all participants and any interested party;¹¹ (6) Resolution of issues shall be by “consensus”; (7) Prior to finalizing an issue resolution, there shall be appropriate notification on the proposed resolution with an opportunity for the industry to review it and provide comment; (8) There shall be careful consideration of all the views and objections, with unresolved comments or objections reported to the committee/forum; and (9) Any resolutions reached are for voluntary implementation by the participants. While each participant is committed to good faith discussions and consideration of timely implementation, each also reserves fully independent judgment in terms of implementation.

¹¹ ATIS has greatly enhanced the efficiencies and the effectiveness of its sponsored committees by the introduction of its homepage which can be found at www.atis.org. This has become the primary publication vehicle for meeting announcements, agendas, minutes, and committees’ outputs. While paper documentation is still available, the breadth of the interested parties that ATIS now reaches with the electronic distributions has expanded greatly. On average, ATIS has approximately 15,000 “hits” per week on its homepage with the number continuing to grow as the ATIS committees strive to have fully electronic operations.

ATIS would have the Commission note that these principles are also the building blocks for ANSI's model accreditation criteria. Further, the ATIS-sponsored non-accredited committees -- the CLC and its subtending committees/forums, the TCIF, the NRSC, and the SIF, built their operations on these important principles.

By way of example, the CLC, proposed by ATIS in September, 1984, and endorsed by the FCC in January, 1985,¹² was established in response to an industry need for mechanisms to discuss and voluntarily resolve issues for the provision of exchange access and telecommunications network interconnection. ATIS's sponsorship of the CLC is based on the recognition that the satisfactory resolution of exchange access and network interconnection issues (i) supports the effective provision of exchange access and interconnection; (ii) facilitates efficient relationships between service providers; and (iii) promotes full and fair competition.

The CLC is an executive oversight committee which provides perspective, direction, and an appeals process for its subtending forums and committees. The forums and committees (i.e., the NIIF, the OBF, the INC, and the TFPC) are the primary organizations to address and resolve issues. The CLC and its associated committees resolve issues based on the consensus of all the participants. The distinction between the CLC, the NRSC, the TCIF¹³ and the SIF, and the

¹² MTS and WATS Market Structure, Phase III: Establishment of Physical Connections And Through Routes Among Carriers; Establishment of Physical Connections By Carriers With Non-Carrier Communications Facilities; Planning Among Carriers For Provision of Interconnection Services, And In Connection With National Defense And Emergency Communications Services; And Regulations For And In Connection With The Foregoing, Memorandum Opinion and Order, CC Docket No. 78-72, Phase III (Adopted: January 15, 1985; Released: January 17, 1985) FCC 85-21, 50 Fed.Reg. 4792, 4796 (1985).

¹³ ATIS notes here that while the TCIF is not accredited and does operate pursuant to consensus procedures, it does continue to seek approval of its guidelines through a ballot process.

Committee T1 is that under the non-accredited committees' consensus approach to resolving issues, there is no voting *per se*. In trying to reach consensus, these groups operate on the principle that although a proposed resolution may not be a participant's first choice, it is one that the participant can accept and support. Any significant opposition to a proposed resolution will usually stop the resolution process and require further reconsideration of the proposal. Any resolutions which are adopted are for voluntary implementation by the participants. While reserving independent judgment as to the ultimate resolution implementation, each participant is committed to discuss issues and consider proposed resolutions in good faith. The CLC minimizes competitive concerns through the safeguards discussed above, ensuring that such principles as open meetings, advance notice and agendas, and publication of minutes and committee resolutions are carefully followed.

ATIS believes that the continuing work of the Committee T1, the CLC and its subtending committees/forums, as well as the TCIF, the NRSC, and the SIF are vital to maintaining the integrity and the efficiency of end-to-end telecommunications network services, operations, and administration. In pursuing this mission, ATIS is certainly aware of the potential impact of the Committees' work on competition. However, with significant safeguards in place, ATIS submits that, whether the entities doing the work are accredited or non-accredited, the processes can function consistent with competitive goals and concerns. With the safeguards discussed herein, ATIS is confident that its committees and forums can continue to provide effective forums for the efficient consideration of a wide variety of telecommunications industry issues with reasonable assurance that their activities will enhance competition and promote innovation in a timely manner.

III. SECTION 273(d)(2): PROPRIETARY INFORMATION

The Commission seeks comment on what impact Section 273(d)(2) as it pertains to the prohibition on use of proprietary information may have on accredited standards development organizations and industry forums.¹⁴ Again, ATIS speaks from its experience with Committee T1. In the case of proprietary knowledge, specifically patents, Committee T1 has adopted the policy of ANSI. The ANSI policy states that there is no objection to drafting a proposed American National Standard in terms that include the use of a patented item, if technical reasons justify the approach. However, prior to the approval of the proposed standard, assurances shall be received from the patent holder that the patentee does not hold nor anticipate holding any invention whose use would be required for compliance with the American National Standard or assurance that 1) a license will be made available without compensation to applicants desiring to utilize the license for purposes of implementing the standard; or 2) a license will be made available to applicants under reasonable terms and conditions that are demonstrably free of any unfair discrimination.

The ANSI policy seeks to encourage early disclosure of patents so as to promote greater efficiency in standards development practices, and Committee T1 has successfully used this policy during its standards development work. It should be noted, however, that the terms and conditions of the licenses are not the subject of Committee T1 deliberations. They are a matter negotiated one-on-one outside of the Committee processes between the licensor and the interested licensee.

¹⁴ NPRM, at para. 39.

IV. ROLE OF ATIS IN ACCESS TO GENERIC NETWORK REQUIREMENTS AND STANDARDS DEVELOPMENT PROCESSES

The Commission seeks comment on the role that ATIS industry forums “might play in ensuring interested parties have access to industry-wide generic requirement and standards development processes.”¹⁵ Paragraph 52 of the NPRM specifically state that “when major changes to generic requirements occur, they are often discussed in [ATIS] industry forums.” ATIS submits that in actuality, the discussion of generic network requirements in its sponsored committees occurs somewhat randomly, and quite infrequently rather than “often” as the Commission states. There is no deliberate process or industry acceptance of one that has generic network requirements changes discussed in the ATIS-sponsored forums. ATIS would, however, encourage and welcome the discussion of generic network requirements and any changes to them in the ATIS industry forums.

In the same context, the Commission asks for comment “on the role that the ATIS industry forums . . . might play in ensuring interested parties have access to industry-wide generic requirements and standards development processes.”¹⁶ As noted above,¹⁷ ATIS has an active and extensive homepage with virtually all of its sponsored committees now using the world wide web site as their primary vehicle for the distribution of information about the committees, including their procedures and by-laws, as well as providing up-to-date records of their activities, meeting dates, agendas, meeting records, and their outputs, whether it be draft standards or consensus issue resolutions. ATIS also lends its site to non-ATIS sponsored organizations because it has established

¹⁵ NPRM, at para. 53.

¹⁶ NPRM, at para. 53.

¹⁷ See fn.11, at p10.

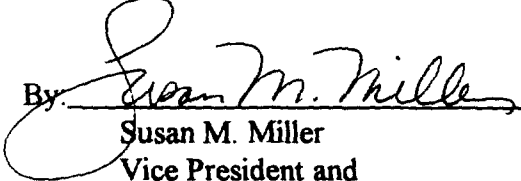
a reputation as a site with much important telecommunications industry information posted on it. It also has established a track record of timely postings and quick availability of information. The North American Numbering Plan Administration Working Group of the North American Numbering Council is one such group. As such, ATIS believes that it could be of assistance in providing access to industry-wide generic requirements and standards development processes via its web site, should it be asked to do so.

V. CONCLUSION

Being aware of the potential of any industry group's work on competition, whether or not they are accredited, ATIS submits certain processes are essential to ensuring that the activities are "open and accessible to the public" as contemplated by the Telecommunications Act of 1996. To this end, the ATIS-sponsored and accredited Committee T1 has implemented procedural safeguards to ensure that its standards development processes operate fairly and not expose its members to antitrust risks. The operating procedures of the non-accredited committees sponsored by ATIS -- the CLC and its subtending groups, the TCIF, the NRSC, and the SIF, which develop operational and technical guidelines, also incorporate due process principles in their procedures as safeguards to ensure that their activities will not result in antitrust difficulties for their participants. ATIS believes that these safeguards are essential for such groups to provide effective forums for the efficient consideration of

a wide variety of telecommunications industry issues with reasonable assurance that their activities will enhance competition and promote timely innovation.

Respectfully submitted,

By: 
Susan M. Miller
Vice President and
General Counsel

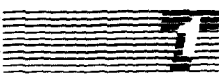
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February 24, 1997

Committees

Standards and Guidelines Activities

**Standards Committee
T1 - Telecommunications**



T1A1
Performance and Signal Processing
Network Survivability
Multimedia Communications

T1E1
Power Systems/Power Interfaces
Analog Access
Wideband Access
Electrical Protection


T1M1
Internetwork Planning/Engineering
Testing and Operations Systems and Protocols

T1P1
Personal Communications
Wireless Access and Terminal Mobility
Program Management and Standards

T1S1
Architecture and Services
Switching and Signaling Protocols
Broadband ISDN

T1X1
Synchronization Interfaces
Metals and Optical Interchange Interfaces

Carrier Liaison Committee




Network Interconnection/Interoperability Forum
Network Testing
Network Installation & Maintenance
Network Interconnection and Architecture
Network Management, Rating & Routing

Ordering and Billing Forum
Access Ordering/Provisioning/Billing
Carrier Selection and Subscription
800/888 SMS Number Administration

Industry Numbering Committee
North American Numbering Plan Guidelines
Local Number Portability

Toll Fraud Prevention Committee
Joint Fraud Investigation Guidelines
Fraud Center Contact List

Telecommunications Industry Forum



Bar Code
Bar Code Label Specifications
Product Package Guidelines

Information Product Interchange
Standard Generalized Markup Language
Technical Illustrations Interchange


Standard Coding
Product Identification Nomenclature Guidelines
Telecommunications Industry Product Identifier

Electronic Data Interchange
Data Interchange Standards
EDI Guidelines

Electronic Commerce
Electronic Communications
Re-engineering Business Processes


Electronic Communications Implementation Committee
Interactive Electronic Information
Implementation of Electronic Communications

Protection Engineers Group




Electrical Protection Equipment
Arrester Unit Standards and Specifications

**Standards Committee 05
Wood Poles and Products**




Wood Crossarms and Timber for Utility Structures
ANSI Standards for Wood Poles, Crossarms and Braces

Network Reliability Steering Committee




Analyze Network Outages
Initiate Corrective Action
Industry/FCC Reports
Liaison with FCC's Network Reliability and Interoperability Council

Electronic Communications Service Provider Committee



Liaison with Law Enforcement Agencies on Network Technology and Court Authorized Electronic Surveillance

SONET Interoperability Forum



Intercarrier Interface Specification Group
Preventing Cascading Network Failure Data
Synchronization Across Network Boundaries


Network Management
CC: Architecture
Information Modeling
Graphics User Interface
Functional Requirements for OS Platforms

Remote Login
Implementation Specifications
Remote Access to Network Management Functionality

TAPPIX 500
T1U Address Resolution Protocol (TARP)
Functional and Interface Specifications and Strategies

Testing
Program Extension
Conformance Testing
Interoperability Testing
Public Register

Internetwork Interoperability Testing Committee



Cross Industry Testing Program for Network Reliability



Alliance for Telecommunications Industry Solutions

Problem Solvers to the Telecommunications Industry